

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

\*\*\*\*\*

**UNITED STATES OF AMERICA**

**v.**

**TERRELL WRIGHT,**

**Defendant.**

**Criminal Action No.**

**5:13-CR- 87 (FJS)**

**INDICTMENT**

**Vio: 18 U.S.C. § 111(a)(1) and (b)  
18 U.S.C. § 924(c)(1)(A)(ii)  
18 U.S.C. § 922(g)(1)**

\*\*\*\*\*

**[Onondaga County]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

On or about December 18, 2012, in the Northern District of New York, defendant

**TERRELL WRIGHT**

did forcibly assault, resist, oppose, impede, intimidate, and interfere with two federally deputized detectives from the Syracuse Gang Violence Task Force, while they were engaged in and on account of the performance of their official duties, and, in the commission of those acts, used a deadly and dangerous weapon, that is a Glock model 27, .40 caliber handgun, serial number NCS050, which had a laser sight affixed to it.

All in violation of Title 18, United States Code, Sections 111(a)(1) and (b).

**COUNT TWO**

On or about December 18, 2012, in the Northern District of New York, defendant

**TERRELL WRIGHT,**

during and in relation to a crime of violence for which he could be prosecuted in a court of the United States, specifically, a violation of Section 111 of Title 18 of the United States

Code, used, carried, and brandished a firearm, that is, a Glock model 27, .40 caliber handgun, serial number NCS050, which had a laser sight affixed to it.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

**COUNT THREE**

On or about December 18, 2012, in the Northern District of New York, defendant  
**TERRELL WRIGHT,**

having been previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a Glock model 27, .40 caliber handgun, serial number NCS050, which was made in Austria.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**FORFEITURE ALLEGATION**

The allegations contained in Counts One through Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c) set forth in Count Two of this Indictment, the defendant,

**TERRELL WRIGHT,**

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

**One Glock model 27, .40 caliber handgun, serial number  
NCS050, which had a laser sight affixed to it.**

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

Dated: February 27, 2013

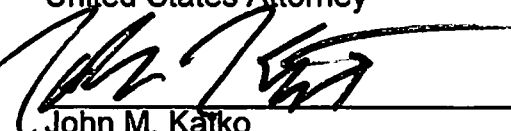
A TRUE BILL

\*\*\*NAME REDACTED\*\*\*

  
FOREPERSON OF THE GRAND JURY

RICHARD S. HARTUNIAN  
United States Attorney

By:

  
John M. Katko  
Assistant United States Attorney  
Bar Roll No. 502457